

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

In Re:

JACKSON GREEN, LLC,

Case No. 11-14038-tsu

Debtor.

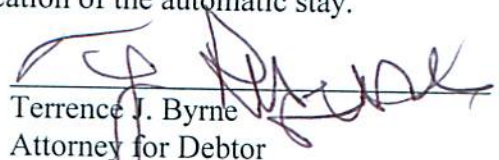
**OBJECTION TO THE MOTION OF WELLS FARGO BANK, N.A., AS TRUSTEE, TO
DISMISS DEBTOR'S CHAPTER 11 CASE OR IN THE ALTERNATIVE MODIFY THE
AUTOMATIC STAY**

NOW COMES the Debtor, Jackson Green, LLC, by its attorney Terrence J. Byrne of Byrne and Krautkramer Law Office for an objection to the Motion of Wells Fargo Bank, N. A. as Trustee, to Dismiss Debtor's Chapter 11 Case or in the Alternative Modify the Automatic Stay on the following basis:

1. That the Debtor filed the Chapter 11 Plan in order to conduct a fair and equitable Bankruptcy Code Section 363 sale in order to pay off its creditors in full.
2. That the Debtor does not seek a modification of the previous chapter 11 plan nor a reorganization plan under the second chapter 11 filing.
3. That the Debtor is permitted to file a second Chapter 11 Plan.
4. That the Debtor had informed Wells Fargo, prior to the Chapter 11 filing, that the Chapter 11 would be filed in order to proceed with a Bankruptcy Code Section 363 sale, in which Wells Fargo did not object to.
5. That one hundred (100%) percent of the net cash flow is being paid to Wells Fargo and that the Debtor is offering adequate protection to Wells Fargo.
6. That granting relief from the automatic stay is not in the best interest of the Debtors' creditors in that a 363 sale may realize sufficient proceeds to pay all creditors in full.

WHEREFORE, the Debtors request that the Court deny the Wells Fargo's motion to dismiss the chapter 11 case and deny its request for modification of the automatic stay.

Dated this 12th day of July, 2011.


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